

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Rachael Decker,

Plaintiff,

v.

United Collection Bureau, Inc.,

Defendant.

Docket 3:20-cv-02229-RDM

(JUDGE ROBERT D. MARIANI)

FILED ELECTRONICALLY

STIPULATION TO EXTEND DEADLINE

1. On April 21, 2023, the Court entered an Order in which it denied Defendant's motion for a protective order, and required Plaintiff to file with the Court responses to Defendant's objections to certain topics contained in Plaintiff's 30(b)(6) deposition notice.

2. The deadline for Plaintiff to file this response is April 28, 2023.

3. Since the Court's Order was entered, the parties have been conferring regarding Defendant's objections, and have been able to resolve some of those objections.

4. In order to allow the parties time to continue their discussions, the parties are hereby requesting that the Court extend the deadline for Plaintiff to file her response to Defendant's objections until May 5, 2023.

5. This request is being made in good-faith and in an effort to resolve the outstanding issues regarding the deposition notice.

WHEREFORE, the parties request that the Court approve this stipulation and extend the deadline for Plaintiff to file a response to Defendant's objections until May 5, 2023.

FREEMAN LAW

/s/ Brett Freeman
Brett Freeman
Bar No.: 308834
Freeman Law
210 Montage Mountain Road
Moosic, PA 18507
Counsel for Plaintiff

GORDON & REES LLP

/s/ Peter G. Siachos (with consent)
Peter G. Siachos
Bar No.: 318250
Gordon Rees Scully Mansukhani
18 Columbia Turnpike, Suite 220
Florham Park, NJ 07932
Counsel for United Collection Bureau, Inc.

ORDER

So ordered.

Date: _____

Robert D. Mariani
United States District Judge